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*al.*

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 **IN RE GOOGLE PLAY STORE**  
5 **ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

6 THIS DOCUMENT RELATES TO:

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED PURSUANT TO  
CIVIL LOCAL RULE 79-5**

7 *Epic Games Inc. v. Google LLC et al.*,  
8 Case No. 3:20-cv-05671-JD

9 *In re Google Play Consumer Antitrust  
Litigation*, Case No. 3:20-cv-05761-JD

10 *State of Utah et al. v. Google LLC et al.*,  
11 Case No. 3:21-cv-05227-JD

Judge: Hon. James Donato

12 *Match Group, LLC et al. v. Google LLC et*  
13 *al.*, Case No. 3:22-cv-02746-JD

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiffs submit this administrative motion to consider whether another party's material should be sealed with respect to the unredacted version of the Declaration of Karma M. Giulianelli filed in support Plaintiffs' Responses to the Minute Order Questions, and Exhibits 4-13, 15, 17, 18, and 20 thereto in their entirety. The portions of the Declaration of Karma M. Giulianelli Plaintiffs seek to temporarily file under seal are listed below:

Section of Declaration	Corresponding Page and Line Number(s)
Giulianelli Declaration ¶ 15	5:21-22, excluding "000475242 (instant message in which a Google employee"
Giulianelli Declaration ¶ 34	10:2-3, excluding "Ex. 20 at 11, 14, Ex." 10:4-5, excluding "C. Google also responded that it" and "Ex. 20 at 16."
Giulianelli Declaration ¶ 36	10:10, excluding "James Kolotouros testified that" 10:11, excluding "MDL Dkt. 258-8. On February 10, 2022, Jamie Rosenberg testified" 10:12 in its entirety 10:13, excluding "MDL Dkt. 258-6. On March 23, 2022, Ashish Pimplapure testified" 10:14, excluding "MDL Dkt. 258- 9."

Plaintiffs oppose the sealing of any portions of these documents but seek leave to provisionally file the documents under seal because they discuss materials that Google has designated confidential or highly confidential under the protective order in this case. *See* Local Rule 79-5(f). Plaintiffs intend to oppose, under Rule 79-5(f)(4), any submission Google makes to support sealing under Rule 79-5(f)(3).

Plaintiffs also hereby provide notice of lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(f).

Dated: January 24, 2023

BARTLIT BECK LLP  
Karma M. Giulianelli

KAPLAN FOX & KILSHEIMER LLP  
Hae Sung Nam

Respectfully submitted,

By: /s/ Karma M. Giulianelli  
Karma M. Giulianelli

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**E-FILING ATTESTATION**

I, Brian D. Wang, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Brian D. Wang  
Brian D. Wang